

**United States Bankruptcy Court
Southern District of Texas**

United States Courts
Southern District of Texas
F I L E D

OCT 11 2019

IN RE

David J. Bradley, Clerk of Court

ALTA MESA RESOURCES, INC. *et al*)

Debtor.

**JOSEPH HAYES JR
CELESTINE SINGLETON BATISTE
LEROY J HAYES**

Plaintiff (s),

v.

ALTA MESA RESOURCES, INC. *et al.*

Defendants.

**Case No. 19-35133
Chapter 11 Bankruptcy Case**

Adversary No. _____

ADVERSARY COMPLAINT

Before the Court is the Objection to Discharge the debt owed to the Singleton Heirs Plaintiff (s), (Joseph Hayes Jr, Celestine Singleton Batiste, and Leroy J Hayes). We are filing this complaint as a Pro Se Litigation. We allege the following:

JURISDICTION

The Court has jurisdiction over this proceeding pursuant to 28 U.S.C. §§ 1334, 157 of the United States District Court for the Southern District of Texas.

BACKGROUND FACTS

The Singleton Heirs own approximately 132 acres of the Avoca Island in Amelia, Louisiana, St Mary Parish Tract being POR NE/4 SEC 36 T16S R13E with addresses of 3899 and 4001 Avoca Road. At first it was Meridian Resources Corporation who came to a Singleton Heir and leased the land for \$1.00. After leasing the land for \$1.00, they bulldozed their homes and got the Police involved to keep them off of their land. This Heir could not read nor write, and understanding was very poor. Upon lease of the land, Meridian stole oil, natural gas, and minerals from the property, sold it and made millions. Then on December 23, 2009, Alta Mesa “acquired” Meridian Resources Corporation after they filed bankruptcy. Over the past years, we have received 7 to 8 dollars a year and for some years we didn’t receive nothing but they continued to drill and profit.

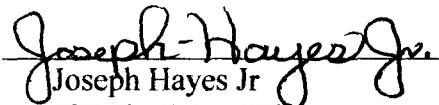
COUNT 1

Theft of Property

Alta Mesa continues as of this day to drill Oil, Natural Gas, and other things such as Salt and chop Timber on our property and sell for profit, to name a few. We have over 200 acres of Wetlands that they lease out also. We believe they hid our money in the Stock Market and profited in that manner also. There was a lease for 28% of the resources received from the property of monetary value for the Singleton Heirs. We the Plaintiffs received \$7 or \$8 dollars a year and some years we received 0 dollars. We are owed much more than that. Now after Alta Mesa has profited well off our resources, they want to hide behind bankruptcy. They have opened up another holding company called Diebold Holdings which is Five Jab Inc., starting the scam all over again. Alta Mesa keep stealing our resources, take our money, and then file for

bankruptcy. It's like a Ponzi scheme. According to the Securities and Exchange Commission, Alta Mesa's net worth is 500 million dollars and we, the above name Plaintiffs, are asking the Court to NOT discharge the debt of 15 million dollars owed to us legally. The property is ours as we pay property taxes yearly and our Ancestors purchased this land in a legal manner.

RESPECTFULLY SUBMITTED


Joseph Hayes Jr
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